

- EPA MEETING -
Harco Site, 44 Old Mill Road, Wilton, CT
Removal Action
Unilateral Administrative Order

AGENDA

Tuesday - May 6, 1993 @ 10:00 a.m., EPA Congress Street Office,
10th floor, Jill Metcalf's office.

OBJECTIVES: Informational meeting to brief involved EPA programs
on what has happened and what is proposed for the
site.

BACKGROUND:

- Administrative Record
 - a. Action Memorandum
- Extent of Contamination Study-March 1992

REMOVAL OPTION

- ERT/REAC Treatability Study-March 22, 1992
 - a. Environmental impact
 - b. Cleanup option levels
 - c. Cleanup levels (EPA OSWER Directive)
- Unilateral Administrative Order

ISSUES

- Limited EPA \$\$\$ for project
- Wetlands
 - a. High water table
 - b. emergency water discharge requirements
 - c. restoration
- Limited roadway access

STATE of CONNECTICUT

- Hazard Ranking System referral to EPA (status)

GILBERT and BENNETT FACILITY

- PRP Notice for the Harco site
- RCRA Action at the Gilbert & Bennett facility

BACKGROUND: 800 cubic yard of sludge and slag was deposited
at the site. It was compounded by the onsite solidification
and burial with on site materials to an estimated volume of
3200 cubic yards.


PROBLEMS: A high water table exist due to a perched
collection system. The proximity to nearby wetlands and the
requirement during excavation to pump, treat and discharge
involve local wetlands regulations. Due to the water
problems on site, any excavation should be performed during
the dry season of July, August or September. Another
problem is the limited access and roadway system up to the
site due to the heavy bedrock formation of the area.





MEMORANDUM

TO: Harco Property Site File

FROM: Paul F. Killian, Roy F. Weston, Inc., Technical Assistance Team 

RE: June 3, 1992 Meeting with CT DEP, and Site Visit

DATE: June 12, 1992

On June 3, 1992, U.S. EPA On-Scene Coordinator (OSC) Paul Groulx and Technical Assistance Team (TAT) member Paul Killian met with Melissa Blais and Doug Zimmerman, of the Connecticut Department of Environmental Protection (CT DEP) to discuss the Harco Property site, located in Wilton, Connecticut. The meeting was held at 18-20 Trinity Street in Hartford, Connecticut at 1000 hours. The CT DEP was presented with a copy of the Administrative Record, the TAT Extent of Contamination Survey Report, and the U.S. EPA Environmental Response Team (ERT) Treatability Study Report. A copy of the agenda is included in Attachment I. Below is a synopsis of issues discussed at the meeting.

- OSC Groulx informed the CT DEP that the site would be cleaned up to a level of 500 ppm lead.
- OSC Groulx requested the CT DEP to investigate disposal options. The CT DEP stated that if the sludge could be separated from the slag, the sludge could be used as landfill cover. The slag, due to its high TCLP results, would have to be handled separately.
- It was agreed that the Harco Property site would be handled separately from the Gilbert and Bennett site, currently going through closure. However, the CT DEP stated that they would contact the state RCRA personnel to determine how the Gilbert and Bennett closure was to be handled. The CT DEP also stated that the public should contact Michael McDaniel if they have knowledge of areas where Gilbert and Bennett deposited the sludge.
- OSC Groulx informed the CT DEP that restoration of the wetlands was not going to be performed under this cleanup. The CT DEP stated that this was not a problem and the major concern was removing the sludge from the site.



- OSC Groulx requested the CT DEP to obtain waivers for state tax on transportation and disposal tax. The CT DEP was also requested to provide the state Applicable or Relevant and Appropriate Requirements (ARARs).
- OSC Groulx informed the CT DEP that the project timetable included a Final Workplan to be prepared within three weeks. However, work will not begin until all the costs are accounted and are within the budget. Work will also be delayed until a location has been determined to send the waste.
- Finally, OSC Groulx informed the CT DEP that they were welcome at the site any time, and were free to attend any meetings. OSC Groulx invited the CT DEP to the meeting that afternoon with the cleanup contractor, and to the two meetings on June 10, 1992, one with Gilbert and Bennett, and the other with the Town of Wilton.

Following the meeting with the CT DEP, OSC Groulx and TAT member Killian proceeded to Wilton, Connecticut. At 1325 hours, they met with Garrett Arai and Christopher Doud, of Guardian Environmental Services, Inc., (Emergency Response Cleanup Services (ERCS) contractors). The ERCS contractors were given a copy of the TAT Extent of Contamination Survey Report and the ERT Treatability Study Report. At 1330 hours the property owner, Costa Stergue, and his associate, Thomas King, arrived and were given a copy of the Administrative Record, the TAT Extent of Contamination Survey Report, and the ERT Treatability Study Report. At 1410 hours, the ERCS contractors were shown the site. There they observed site conditions and collected samples for disposal tests. At 1600 hours, all personnel departed the site. TAT member Killian returned to the TAT office, while OSC Groulx remained for a meeting with Gilbert and Bennett, and the Town of Wilton.

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ATTACHMENT I

AGENDA TO MEETING WITH CT DEP

STATE - EPA MEETING
Wednesday June 3, 1992
Harco Site, Old Mill Road, Wilton, CT

AGENDA

- 10:00
- State ARAR's
 - Administrative Record
 - a. US EPA funding available
 - b. Action Memorandum
 - c. Record of Decision
 - Extent of Contamination Study
 - Roy F. Weston, Inc - March 1992
 - a. Potential offsite migration
 - b. Point source
 - c. Area of contamination
 - d. Removal options
 - Cleanup Levels
 - a. EPA OSWER Directive for lead
(Residential vs. Commercial)
 - US EPA-ERT/REAC Treatability Study
 - Final Report March 22, 1992
 - a. Environmental impact
 - b. Cleanup options
 - c. Cleanup levels
 - Wetlands Issues
 - a. restoration
 - Permits Waiver (state/local)
 - a. disposal tax
 - b. transportation
 - c. construction
 - State of Connecticut Role
 - RCRA Action at the Gibert & Bennett facility
 - a. Cleanup levels
 - b. Zinc impact to cleanup
 - c. PRP Notice for Harco site

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